From: PETERSON Jenn L
To: Eric Blischke/R10/USEPA/US@EPA
Subject: RE: Round 3 Data Gaps Memo
Date: 12/01/2005 01:53 PM

Eric,

As I am sure you and others are also thinking, I wish I had more time to look this over. With the exception of the comments I brought up yesterday, I think most of the message is here but it would be better if was a clearer message. I think the most confusing part for me is the inconsistency in the treatment of transition zone water. There are different objectives between risk and nature and extent. I didn't get to review Table 5 really at all, but glancing at it at the meeting made me wonder what all the "NO"s under Transition zone water meant and what EqP meant for the risk assessment. Is this table just for N&E? Would we have a different one for risk? Also confusing is there is no gw / trans water section for the eco risk. I wouldn't want it to come across that because we don't have a section there aren't data needs associated with it, or that we don't wouldn't have an approach we would want them to follow. We didn't discuss it. However, there are issues such which screening numbers to use where, and when site specific testing may be needed, that would have been good to outline. Hopefully we will have time to clarify this stuff with the LWG after the fact.

The other thing that is a little disjointed is the eco data needs table and the approach text. Maybe we would mention Table 7 in the text and mention some of the key points (is this already here and I missed it? is this what is mentioned in section 4.6?). The way it is now it is a little unclear the importance of Table 7, since some of the issues mentioned there are not developed at all the text. Sorry I can't be of more assistance today in helping with this!

My comments from yesterday were:

Section 2.2.2 - Add an objective to get tissue between RM 11 and 14 as well as sediment data.

Section 3.1.5 Transition Zone Water: Add that in order to assess risk and loading we may need to collect location specific tissue samples or conduct in situ toxicity tests (e.g. Hyalella) or bioaccumulation tests (e.g. Lumbriculus) to assess the risk of accumulation and toxicity associated with the discharge.

Section 4.5.1, PAHs and fish: Add Mikell's changes here as well - we clarified that a "small concentration of PAHs in WATER can result in a huge dose to the fish". With that in mind, I would explicitly add that as another line of evidence: Water concentration expressed as a dose (ug/g per fish per day). It doesn't take much concentration in the water to get to a significant dose. If you know the ventilation rate and uptake efficiency, you can get ug of PAH coming into a fish. Also note that they shouldn't be using a BaP based number (TRV) - need a total PAH TRV. The analysis should be the list of 40 PAHs from the NOAA list. [This stuff may be better suited for the FSP, but FYI].

Section 4.5.3, Approach for assessing risk from metals to fish: Add the language that Mikell sent that clarifies the PCB / PAH prioritization better and the language on analyzing for metals in stomach contents along with PAHs in order to reduce uncertainty in the dietary approach.

Thanks for all your hard work!

-Jennifer